

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

DIGITAL MEDIA SOLUTIONS, LLC	)	CASE NO. 1:19-cv-145
	)	
Plaintiff,	)	JUDGE DAN AARON POLSTER
	)	
v.	)	MAGISTRATE JUDGE
	)	THOMAS M. PARKER
SOUTH UNIVERSITY OF OHIO, LLC <i>et</i>	)	
<i>al.</i> ,	)	
	)	
Defendants.	)	

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**DECLARATION OF CONNIE ADELMAN**

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Connie Adelman hereby declares under penalty of perjury that the following is true and correct:

1. I am a resident of the State of Indiana.
2. I make the within declaration from my own personal knowledge, and I am competent to so testify.
3. I am the Chief Restructuring Administrator at Dream Center Education Holdings, LLC (“DCEH”).
4. I am aware that Studio Enterprise Manager, LLC (“Studio”) on April 1, 2019 hired eight DCEH employees who are responsible for ensuring DCEH’s compliance with the regulatory and compliance entities that oversee the operation of the related schools. Although Studio hired these risk and compliance employees on April 1, DCEH did not learn that Studio had hired these employees until April 9.

5. These employees are critical to ensuring that DCEH remains compliant with the EDMC Consent Judgment. In addition, these risk and compliance employees provided compliance support for South University, the Western State College of Law and the Art Institute of Las Vegas.

6. Absent the eight risk and compliance employees Studio hired away from DCEH, the Settlement Administrator of the EDMC Consent Judgment may find DCEH in violation of the Consent Judgment for its failure to maintain the requisite staff necessary to ensure compliance.

7. The employees Studio hired were the only DCEH employees responsible for risk and compliance support.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief. Executed the 10 day of April, 2019 in Muncie, Indiana.



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Connie Adelman